**To:** Vergeront, Julie[Vergeront.Julie@epa.gov]

From: Morales, Javier

**Sent:** Mon 11/2/2015 5:51:30 PM

Subject: FW: U.S. EPA Region 10, Question on Certificate of Inspection for Ammonia Northwest

;; Julie,

I talked Mr. Norris on October 29, 2015, Thursday morning on questions I had on the Certificates of Inspection for Multistar Industries, Inc. Below are his responses to my questions based on your phone conversation.

1. Is it normal practice to identify the name given on the pressure vessel "Ammonia Northwest", instead of the actual owner/operator of the pressure vessel, "Multistar Industries, Inc." for the certification of inspection?

Mr. Norris that name of the company for the certificates is what the inspector puts on the bill of lading for the inspection. The inspectors do not verify the specific company parent name.

2. Does the WA L&I Boiler inspector review or request the owner/operator to provide inspection and testing data for hydrostatic and NDE testing for unfired pressure vessels operating in noncorrosive conditions? In this case, Multistar provided the EPA inspection and testing data on their pressure vessels conducted in June 2010.

Mr. Norris stated that the Boiler & PV inspector issues Certificates of Inspection based on visual inspection of the unfired pressure vessels. Mr. Norris stated that the Boiler & PV inspector would not have told the Multistar to conduct the hydrostatic and NDE testing on the unfired pressure vessels, unless there is "nonconformance". Then Boiler & PV inspector will require inspection and testing of a pressure vessel, if there is "nonconformance" such as serious corrosion on the pressure vessel located at the concrete saddle. Companies such as Multistar can have their own policy to conduct this type of inspection and testing of their pressure vessels. Mr. Norris was not familiar with API 510 that requires the inspector to be certified to conduct these type of inspections and tests. Mr. Norris stated that if Multistar is conducting hydrostatic testing, they should be doing only at the maximum allowable working pressure (MAWP).

Best Regards,

**Javier Morales** 

**EPA Region 10** 

## **RMP** Coordinator

Pesticides and Toxics Unit

Office of Compliance and Enforcement

(206) 553-1255

From: Morales, Javier

Sent: Wednesday, October 28, 2015 2:47 PM

To: 'NORY235@lni.wa.gov'

Subject: U.S. EPA Region 10, Question on Certificate of Inspection for Ammonia Northwest

Importance: High

Mr. Norris,

The U.S. EPA Region 10, Risk Management Program, obtained some Certificate of Inspections for two unfired pressure vessels during an inspection at the Multistar Industries, Inc. ammonia storage facility located at 101 West Fir, Othello, WA 99344 which identified you as the inspector (See below). Listed are some questions that would help me understand the issuing of certificates of inspection.

- 1. Is it normal practice to identify the name given on the pressure vessel "Ammonia Northwest", instead of the actual owner/operator of the pressure vessel, "Multistar Industries, Inc." for the certification of inspection?
- 2. Does the WA L&I Boiler inspector review or request the owner/operator to provide inspection and testing data for hydrostatic and NDE testing for unfired pressure vessels operating in noncorrosive conditions? In this case, Multistar provided the EPA inspection and testing data on their pressure vessels conducted in June 2010.

If you have any questions, please contact me.

STATE	Department of Labor and Industries		INSPECTION DATE	
Sec.	Specialty Compliance Services		07/06/2012	
	P.O. Box 44410, Olympia, WA 9850	4-4410	SPECIFIC PLANT LOCATION	
	CERTIFICATE OF INSPECTI	ON	YARD	
LOCATION	OF OBJECT		OBJECT INFORMATION	
_			Other#	
Ammonia Northwest			NB#	381
101 W Fir			MANUFACTURER	KAI
Othello, WA 99344-1060			TYPE	АМ
			USE	Sto
			SV SETTING	250
			YEAR BUILT	195
			INSPECTOR	Joh
**************************************			INSP. EMPLOYER	Sta

Post this certificate in a conspicuous place in the room containing the object. It must be available for view been paid. The Object shall not be operated at a pressure in excess of that shown. Notify the State of W. 360-902-5272 or 5273 or your insurance carrier 60 days prior to the expiration date. It is a violation of W. inspection certificate posted near the object.

Department of Labor and Industries Specialty Compliance Services	INSPECTION DATE 07/06/2012
P.O. Box 44410, Olympia, WA 98504-4410  CERTIFICATE OF INSPECTION	SPECIFIC PLANT LOCATION  Yard
LOCATION OF OBJECT	OBJECT INFORMATION
Ammonia Northwest 101 W Fir Othello, WA 99344-1060	Other #  NB #  MANUFACTURER  TYPE  AM  USE  SV SETTING  YEAR BUILT  INSPECTOR  INSP. EMPLOYER  S44  54  54  54  54  54  54  54  54  5

Post this certificate in a conspicuous place in the room containing the object. It must be available for view been paid. The Object shall not be operated at a pressure in excess of that shown. Notify the State of W 360-902-5272 or 5273 or your insurance carrier 60 days prior to the expiration date. It is a violation of W inspection certificate posted near the object.

Best Regards,

**Javier Morales** 

**EPA Region 10** 

RMP Coordinator

Pesticides and Toxics Unit

Office of Compliance and Enforcement

(206) 553-1255